

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

FILED  
U.S. DISTRICT COURT  
SAVANNAH DIV.

2018 SEP 10 AM 11:51

CLERK   
SO. DIST. OF GA.

**UNITED STATES OF AMERICA**

) **INDICTMENT NO.**

**v.**

) **18 U.S.C. § 371** **CR 218-041**

) **Conspiracy**

**CALEB JAMES ANDERSON**

)

**AUSTIN ALLEN CROSS**

) **18 U.S.C. § 842(h)**

**SEAN PATRICK REARDON**

) **Possession of Explosive Materials**

**KYLE PRESTON CLASBY**

)

) **18 U.S.C. § 641**

) **Theft of Government Property**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

*Conspiracy*

**18 U.S.C. § 371**

From on or around September 2010 up to and including February 15, 2018, the precise dates being unknown, in Camden County, in the Southern District of Georgia, and elsewhere, the defendants

**CALEB JAMES ANDERSON,  
AUSTIN ALLEN CROSS,  
SEAN PATRICK REARDON, and  
KYLE PRESTON CLASBY,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with others known and unknown:

a) to knowingly receive, conceal, and retain stolen property belonging to the United States, to wit, small arms ammunition and explosives, with the intent to deprive the United States of the use and benefit of that property and to convert that property to their own use or gain, said property of a value exceeding \$1,000, in

violation of Title 18, United States Code, Section 641;

b) to receive, possess, transport, conceal, store, and dispose of stolen explosive materials which had been shipped or transported in interstate or foreign commerce, knowing and having reasonable cause to believe that the explosive materials were stolen, in violation of Title 18, United States Code, Section 842(h).

### **Overt Acts**

In furtherance of and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Southern District of Georgia and elsewhere:

a) On or about September 2010 through July 2014, on multiple occasions, while serving as United States Marines, the precise dates being unknown, defendants **CALEB JAMES ANDERSON, AUSTIN ALLEN CROSS, and KYLE PRESTON CLASBY** stole small arms ammunition and explosives from the armory at Naval Submarine Base Kings Bay, in Camden County, Georgia.

b) On or about September 2010 through July 2014, on multiple occasions, while serving as United States Marines, the precise dates being unknown, defendants **CALEB JAMES ANDERSON and AUSTIN ALLEN CROSS** concealed small arms ammunition and explosives stolen from the armory at Naval Submarine Base Kings Bay, in Camden County, Georgia by burying the items at the "Shoot House" located on Naval Submarine Base Kings Bay.

c) On or about September 2010 through July 2014, on multiple occasions, while serving as a United States Marine, the precise dates being unknown, defendant

**CALEB JAMES ANDERSON** altered paperwork to make it appear as though stolen ammunition was accounted for or expended so he could provide it to other people, to include defendants **AUSTIN ALLEN CROSS, SEAN PATRICK REARDON** and **KYLE PRESTON CLASBY**.

d) On or about September 2010 through July 2014, on at least one occasion, the precise dates being unknown, defendants **CALEB JAMES ANDERSON** and **AUSTIN ALLEN CROSS** entered Naval Submarine Base Kings Bay, removed the stolen small arms ammunition and explosives from Naval Submarine Base Kings Bay, and transported them to 103 Doris Street, St. Mary's Georgia, a rental property owned by the defendant **SEAN PATRICK REARDON**.

e) On or about September 2010 through July 2014, on multiple occasions, while serving as a United States Marine, the precise dates being unknown, defendant **KYLE PRESTON CLASBY** entered Naval Submarine Base Kings Bay, removed the stolen small arms ammunition and explosives from Naval Submarine Base Kings Bay, and transported them to unknown locations, to include transporting them from the Southern District of Georgia, to defendant **KYLE PRESTON CLASBY'S** residence, at 1456 Gem Drive, Pueblo West, Colorado 81077.

f) On or about September 2010 through July 2014, the precise date being unknown, defendants **CALEB JAMES ANDERSON, AUSTIN ALLEN CROSS** and **SEAN PATRICK REARDON** buried the stolen small arms ammunition and explosives at 103 Doris Street, St. Mary's Georgia.

g) On or about February 14, 2018, defendant **SEAN PATRICK REARDON**



disposed of two crates of stolen small arms ammunition and explosives, previously buried at his rental property located at 103 Doris Street, St. Mary's Georgia, by dumping the crates into the Satilla River from a boat ramp in Woodbine, Georgia.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

*Possession of Stolen Explosive Materials*

18 U.S.C. § 842(h)

From on or around September 2010, the precise dates being unknown, up to and including February 15, 2018, in Camden County, in the Southern District of Georgia, and elsewhere, the defendants,

**CALEB JAMES ANDERSON,  
AUSTIN ALLEN CROSS,  
SEAN PATRICK REARDON,**

aided and abetted by each other, did receive, possess, transport, conceal, store, and dispose of stolen explosive materials which had been shipped or transported in interstate or foreign commerce, knowing and having reasonable cause to believe that the explosive materials were stolen, in violation of Title 18, United States Code, Section 842(h).

**COUNT THREE**

*Theft of Government Property*  
18 U.S.C. § 641

From on or around September 2010, up to and including February 15, 2018, the precise dates being unknown, in Camden County, in the Southern District of Georgia, and elsewhere, the defendants,

**CALEB JAMES ANDERSON,  
AUSTIN ALLEN CROSS,  
SEAN PATRICK REARDON, and  
KYLE PRESTON CLASBY,**

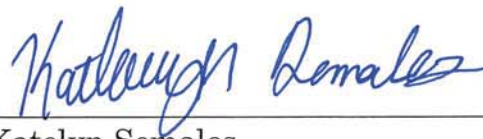
aided and abetted by each other, did knowingly conceal and retain stolen property belonging to the United States, to wit, small arms ammunition and explosives, with the intent to deprive the United States of the use and benefit of that property and to convert that property to their own use or gain, said property of a value exceeding \$1,000, in violation of Title 18, United States Code, Section 641.

A True Bill

Foreperson



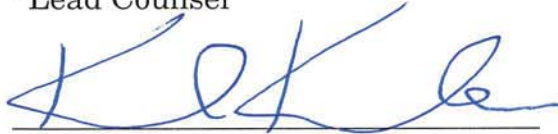
Bobby L. Christine  
United States Attorney



Katelyn Semales  
Special Assistant United States  
Attorney  
\*Lead Counsel



Brian T. Rafferty  
Assistant United States Attorney  
Chief, Criminal Division



Karl Knoche  
Assistant United States Attorney  
Co-Counsel